


which sets forth the proposed schedule. The reasons for this Motion are set forth in the Memorandum in Support.

Respectfully submitted,

Dated: December 22, 2008

BRICKER & ECKLER LLP



Joseph R. Dreitler
Mary R. True
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: 614.227.2300
Facsimile: 614-227.2390
E-mail: jdreitler@bricker.com
E-mail: mtrue@bricker.com

*Attorneys for Plaintiffs Harry Winston, Inc.
and Harry Winston, S.A.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HARRY WINSTON, INC.

and

HARRY WINSTON, S.A.,

Plaintiffs,

V.

CHARLES WINSTON LUXURY GROUP, LLC

and

LP WATCH GROUP, INC.

and

CWE CONSULTING CORPORATION,

Defendants.

) Case No.: 2:08-CV-536
)
)
) Judge: Holschuh
)
) Magistrate Judge: King
)
)
)
)
)
)
)
)
)
)
)
)
)
)

MEMORANDUM IN SUPPORT OF STIPULATED MOTION
FOR ENTRY OF DISCOVERY AND BRIEFING SCHEDULE

On December 5, 2008, Defendants LP Watch Group, Inc. and Charles Winston Luxury Group, LLC (“Defendants”) filed a Motion to Dismiss or Transfer for Lack of Personal Jurisdiction, Insufficiency of Process and Improper Venue stating that Defendants’ contacts with this forum were not sufficient enough for this Court to exercise personal jurisdiction over Defendants in this litigation. In support of this Motion to Dismiss, Defendants submitted the Declaration of David Koss.

The parties propose that the following discovery and briefing schedule be established to enable the parties to conduct limited and expedited written discovery on the issue of personal jurisdiction and take depositions as appropriate.

January 5, 2009	Deadline for the parties to serve discovery requests limited to the issue of personal jurisdiction over Defendants.
January 23, 2009	Deadline for responses to discovery requests.
February 13, 2009	Deadline for taking any depositions relating to the issue of personal jurisdiction.
March 2, 2009	Deadline for Plaintiff to file Memorandum in Opposition to Motion to Dismiss.
March 13, 2009	Deadline for Defendants to file any reply brief.

This proposed schedule has been agreed upon by the parties and accommodates their schedules. This discovery and briefing schedule is necessary to permit the parties time to conduct discovery into the facts asserted in Mr. Koss' declaration and the Motion to Dismiss. A proposed Order is attached as Exhibit A to this Motion.

Respectfully submitted,

Dated: December 22, 2008

BRICKER & ECKLER LLP



Joseph R. Dreitler
Mary R. True
100 South Third Street
Columbus, Ohio 43215-4291
Telephone: 614.227.2300
Facsimile: 614-227.2390
E-mail: jdreitler@bricker.com
E-mail: mtrue@bricker.com

*Attorneys for Plaintiffs Harry Winston, Inc.
and Harry Winston, S.A*